

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

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<b>RALPH ROBINSON</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	Civil Action No. 2:12-CV-30
	)	<b>District Judge Collier</b>
<b>HOSTO &amp; BUCHAN, PLLC,</b>	)	<b>Magistrate Judge Carter</b>
	)	
	)	<u>Jury Trial Demanded</u>
<b>Defendant.</b>	)	

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**PLAINTIFF’S MOTION FOR ATTORNEY FEES AND COSTS**

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Pursuant to Fed. R. Civ. P. 54(d)(2), Local Rule 54.2, and 15 U.S.C. § 1692k(a)(3), Plaintiff moves the Court for an Order that Defendant Hosto & Buchan, PLLC (“Hosto”) pay costs and attorney fees in the amount of \$111,011.55, as totaled through March 5, 2014, in response to entry of the February 26, 2014 amended Judgment [**Doc. 114**], and files a memorandum in support.

Alan C. Lee and Everett H. Mechem represented plaintiff in this case. An itemized account of counsel’s hours expended is contained in **exhibit 3 to the memorandum**, with their standard and customary fees shown in their declarations, **exhibits 1 and 2 to the memorandum**, respectively, and their unreimbursed expenses listed in **exhibit 5 to the memorandum**.

Counsel will submit a supplemental declaration after the completion of the briefing and any hearings on this motion, detailing the additional time and costs hereafter expended on this matter.

Plaintiff therefore requests an Order awarding reasonable attorney fees in the amount of \$110,623.75 and costs of \$387.80, through March 5, 2014, and further requests costs and attorney fees for the time expended litigating this motion.

03/05/14

Respectfully submitted,

**RALPH ROBINSON**

/s/ Alan C. Lee  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic case filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic case filing system.

/s/ Alan C. Lee  
Alan C. Lee, Esq., Attorney for Plaintiff